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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION – LOS ANGELES**

Frankel, et al.,

Plaintiffs,

v.

Regents of the University of  
California, et al.,

Defendants.

Case No. 2:24-CV-4702-MCS

**STIPULATION FOR CONSENT  
JUDGMENT AND PERMANENT  
INJUNCTION**

Judge: Hon. Mark C. Scarsi  
Courtroom: 7C

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9 *‡Not admitted to the D.C. Bar; admitted only in Texas. Supervised by licensed D.C.*  
10 *Bar members*

1 WHEREAS, Plaintiffs Yitzchok Frankel; Joshua Ghayoum; Eden  
2 Shemuelian; and Dr. Kamran Shamsa (“Plaintiffs”) and Defendants The Regents of  
3 the University of California; Michael V. Drake; Julio Frenk; Darnell Hunt; Michael  
4 Beck; Monroe Gorden, Jr.; and Steve Lurie (“Defendants”) (collectively, the  
5 “Parties”) have settled this case, *see* ECF 205 (Joint Status Report);

6 WHEREAS, the Parties have agreed to the entry of the attached [Proposed]  
7 Consent Judgment and Permanent Injunction, as evidenced by their signatures on  
8 this stipulation;

9 THEREFORE, IT IS HEREBY AGREED AND STIPULATED, by and  
10 between the Parties, that the [Proposed] Consent Judgment and Permanent  
11 Injunction may be entered by the Court, and the Parties respectfully request that the  
12 Court do so.

13 **IT IS SO STIPULATED.**

14  
15 Dated: July 28, 2025

Respectfully submitted,

16 By: /s/ Matthew R. Cowan  
17 MATTHEW R. COWAN  
18 *Attorney for Defendants The Regents of*  
19 *the University of California; Michael V.*  
20 *Drake; Julio Frenk; Darnell Hunt;*  
21 *Michael Beck; Monroe Gorden, Jr.;*  
22 *and Steve Lurie*

23 /s/ Mark L. Rienzi  
24 MARK L. RIENZI  
25 *Attorney for Plaintiffs Yitzchok*  
26 *Frankel; Joshua Ghayoum; Eden*  
27 *Shemuelian; and Dr. Kamran Shamsa*  
28

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-4.3.4, I hereby attest that the other signature listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 28, 2025

Respectfully submitted,

By: /s/ Matthew R. Cowan

MATTHEW R. COWAN  
*The Regents of the University of  
California; Michael V. Drake; Julio  
Frenk; Darnell Hunt; Michael Beck;  
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